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January 6, 2023

VIA E-MAIL

Hon. Lorna G. Schofield
U.S. District Court, Southern District of
New York
40 Foley Square, Courtroom 1106
New York, New York 10007

Re: *loanDepot.com, LLC v. CrossCountry Mortgage, LLC, et al.*, No. 1:22-cv-05971-LGS
Joint Status Letter

Dear Judge Schofield:

Pursuant to the September 1, 2022 Case Management Plan and Scheduling Order (ECF No. 80), the Parties submit this joint status letter.

Discovery Disputes: The Parties exchanged detailed written position statements on their respective discovery disputes. The parties intend to schedule another call to continue to try and narrow the discovery disputes between them. The parties anticipate that discovery motion practice will likely be necessary.

Expedited Discovery: Plaintiff, Defendant CrossCountry, and the 13 newly added Individual Defendants have made, or will make, their supplemental expedited discovery productions of documents today. The Individual Defendants will also make additional supplemental expedited discovery document productions on Monday, January 9, 2023, as necessary.

The Parties appreciate the Court's attention to this matter.

January 6, 2023
Page 2

Sincerely,

/s/ Jessica F. Pizzutelli

Jessica F. Pizzutelli

cc: All Counsel of Record